

# 1.0 Summary of Recommendations for Ireland

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Recommendations included in the roadmap for Ireland can be summarised as follows:

1. Undertake a critical evaluation of the success of the revised regulatory regime for the household waste collection market two years after its implementation. In the event that the currently proposed legislation and associated enforcement efforts are deemed to be insufficient in securing delivery of Irish household waste management objectives – in particular with regard to ensuring there is full compliance with the requirement for separation, or in respect of meeting future higher targets – Ireland should consider what further regulatory or policy options are available to address identified weaknesses, taking into account suitability and effectiveness of the current statutory and regulatory arrangements particularly when compared against best practice in other member states.
2. Consider introducing a fiscal incentives that are sufficient to encourage the application of the waste hierarchy by ensuring the existing cost differential between landfill disposal and recycling is maintained when residual waste is directed for treatment at other residual waste treatment facilities (including pre-treatment facilities and waste sent directly to incineration).

## 2.0 Potential Issues with Approach to Waste Management

Number	Potential issue	Description	Reasons for the issue
1	Fragmentation of the household waste collection market	There are a relatively large number of household waste collectors in Ireland, including a significant contribution from smaller collection organisations along with that of the larger national players.	The waste services market in Ireland remains relatively open – local authorities do not have exclusive right to provide the service of household waste collections. Greater controls will be put in place during the forthcoming reforms of the household collection market. The plans confirm that the emphasis in the future will be on increased enforcement, and control of the private contractors via more stringent permit conditions. If enforcement is not successful, introduction of Pay-by-Weight systems may result in more fly tipping / evasion.
2	Households not subscribing to a kerbside collection system.	Under the new system, no absolute obligation will be placed on the householder to contract with an authorised collector. The onus will be on the regulator (in this case the local authority) to ensure householders are managing waste in an environmentally acceptable manner. Where waste is not treated via a kerbside collection service, international experience has shown that materials may not be so successfully segregated and recycling may be lower. Other methods for treating waste include civic amenity sites and bring site services, although it is intended the use of these systems will be brought under control, with costs applied to the use of civic amenity sites by householders. Backyard burning and other illegal waste disposal activities can also occur where waste is not treated using formal systems.	<p>An estimated 28% of households did not subscribe to any kerbside collection in 2012. There is a requirement under national legislation that a holder of waste is required to treat or have waste treated in line with the waste hierarchy, including through organising for the treatment or collection of waste by an authorised establishment / collector, but individual householders may still be able to slip through the net if the enforcement regime is not sufficiently robust.</p> <p>A review of enforcement measures is currently taking place. Although additional measures are expected to improve the situation in the future, the effectiveness of these actions cannot yet be determined. It is clear, however, that the success of the system will depend in part on there being sufficient budget available to ensure effective enforcement.</p>

Number	Potential issue	Description	Reasons for the issue
3	Weakening influence of the landfill levy	This has driven the recent improvements in recycling performance to a large extent but this trend is not expected to continue. No such tax is currently applied to residual waste subjected to other treatment methods, including waste exported for incineration.	Ireland is well on track to meet its landfill directive targets, as a result of very substantial increases in the amount of waste being diverted from landfill. As such the landfill levy is expected to decline in its importance as a driver of future improved recycling rates.

## 3.0 Recommended Measures

Measure	Type of instrument	Responsibility	Estimated costs	Available EU funding	Anticipated impact
<b>Undertake future review of recent collection market reforms</b>					
<p>Experience from other European countries indicates that it is difficult to specify the charging system without understanding the detailed functioning of collection systems (particularly collection frequency), the latter being separately dictated by the permit system in Ireland. The future success of the PAYT systems is also likely to be dependent on effective enforcement, and on the interface between the proposed charging system and the collection system. Updates to the regulatory regime have not yet taken place, and these are expected to improve the performance of the current system once implemented. However, some uncertainties remain.</p> <p>It is therefore recommended that Ireland undertake a critical evaluation of the success of the revised regulatory regime for the household waste collection market when data for two years after its implementation is available (the review should therefore commence in 2019). In the event that the currently proposed legislation and associated enforcement efforts are deemed to be insufficient in securing delivery of Irish household waste management objectives – potentially also in respect of meeting future higher targets – Ireland should consider what further regulatory or policy options are available to address identified weaknesses, taking into account the suitability and effectiveness of the current statutory and regulatory arrangements particularly when compared against best practice in other member states.</p>	Legal / administrative	DECLG / local authorities	Dependent upon approach taken	N/A	Will address potential issues 1 and 2.

Measure	Type of instrument	Responsibility	Estimated costs	Available EU funding	Anticipated impact
<b>Reforms to waste taxation</b>					
<p>In line with national policy, consider the introduction of fiscal incentives as necessary to encourage application of the waste hierarchy in order to ensure the cost of disposal through other treatment routes is no less than the landfill cost. Past recycling performance has been driven in large part by the landfill levy, but the impact of this on future increases in recycling rates is expected to decrease as very substantial increases have already occurred in the amount of waste that has been diverted from landfill. This is likely to be of greater significance in Ireland given there is no direct financial incentive on Irish local authorities to meet the recycling targets that have been passed on to them.</p> <p>The fiscal incentives should take account of the tonnage of material entering Irish pre-treatment facilities as well as materials exported to residual waste treatment facilities outside Ireland (excluding waste that is recycled at all these plants).</p>	Fiscal	DOEHLG	Costs to fall on waste producers	N/A	Will act as a further check to ensure that the cost differential remains in favour of recycling over residual waste treatment, thereby tackling issues 3 and 4.

### 3.1 Timeline for introducing the Proposed Measures

	2015	2016	2017	2018	2019	2020
<b>Introduce fiscal incentives</b>		Announcement of analysis	Outcome of Analysis		Fiscal incentives In place	
<b>Review recent collection market reforms and undertake further reform (if necessary)</b>				Announcement of Performance Review		Outcome of Review

